IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JULISSA GREEN, on behalf of her minor child,)
DANASHA MCCORY, and as next friend of her) Case No. 22-CV-02918
minor grandchild, BAYLIE BELL,)
) Hon. Andrea R. Wood,
Plaintiffs,) District Judge
)
v.) Hon. Heather K. McShain,
) Magistrate Judge
THE CITY OF CHICAGO, et al.)
) Jury Trial Demanded
Defendants.)

PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' JOINT MOTION TO BIFURCATE MONELL CLAIMS

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

HESTER MENDEZ, et al)	Case No. 18-cv-5560
Plaintiffs,)	Judge John Z. Lee
v.)	Magistrate Judge Young B. Kim
THE CITY OF CHICAGO, et al)	
Defendants.)	

EXHIBIT INDEX TO DEFENDANTS' RESPONSE TO PLAINTIFFS' LOCAL RULE 56.1(b) STATEMENT OF ADDITIONAL UNDISPUTED MATERIAL FACTS

The following deposition exhibits listed below are being re-filed with additional pages inserted from the previously deposition exhibits e-filed on October 26, 2021, with Defendants' Rule 56.1 Statement of Undisputed Material Facts in Support of Their Joint Motion for Summary Judgment:

Exhibit 3:	Deposition of Officer Cappello
Exhibit 4:	Deposition of Officer Donnelly
Exhibit 6:	Deposition of Sergeant Egan
Exhibit 8:	Deposition of Lt. Dari
Exhibit 9:	Deposition of Officer Guzman
Exhibit 10:	Deposition of ASA Glen Runk
Exhibit 11:	Deposition of Officer Hernandez
Exhibit 12:	Deposition of Hester Mendez

ADDITIONAL EXHIBITS:

Exhibit 47: BWC Timeline	
Exhibit 48: Expert Report of Matthew J. Hickman, Ph.D.	
Exhibit 49: Deposition of Officer Hefel in Simmons v. City of Chi., et al., 14	CV 9042
Exhibit 50: Defendant Officers' Answer to the Second Amended Compla	aint,
Blassingame v. City of Chi., et al., 19 CV 7287, Dkt. 105	
Exhibit 51: Defendants' Rule 12(b)(6) Motions to Dismiss,	
Smith v. City of Chi, et al., 21 CV 890, Dkt. 29, 31	
Exhibit 52: Group Exhibit - SWAT Officers' Answers to Interrogatory N	Io. 3,
Wilson v. City of Chi., et al., 19 L 8047	
Exhibit 53: BWC Video Clip-QH 0147 – Archie v. City of Chi., et al., 19 CV	⁷ 4838
Exhibit 54: BWC Video Clip-QH 0148 – Archie v. City of Chi., et al., 19 CV	⁷ 4838
Exhibit 55: BWC Video Clip-QH 0149 – Archie v. City of Chi., et al., 19 CV	⁷ 4838
Exhibit 56: BWC Video Clip-QH 0152 – Archie v. City of Chi., et al., 19 CV	⁷ 4838

Exhibit 57: BWC Video Clip-QH 0154 – Archie v. City of Chi., et al., 19 CV 4838 Exhibit 58: Deposition of Officer Santisuk, Ebony Tate v. City of Chi., et al., 18 CV 7439 Deposition of Officer Lopez, Ebony Tate v. City of Chi., et al., 18 CV 7439 Exhibit 59: Exhibit 60: Deposition of Officer McCallum, Ebony Tate v. City of Chi., et al., 18 CV 7439 Exhibit 61: Defendant Officers' Answer to the Second Amended Complaint, Bures v. City of Chi., et al., 19 CV 2040, Dkt. 68 Defendant Officers' Answers to the Third Amended Complaint, Exhibit 62: Toni Tate v. City of Chi, et al., 19 CV 7506, Dkt. 137 Defendant Officers' Answers to the Amended Complaint, Exhibit 63: Evans v. City of Chi., et al., 21 CV 4135, Dkt. 36 Exhibit 64: Defendant Officers' Answers to the Amended Complaint, Lyons v. City of Chi., et al., 20 CV 3412, Dkt. 84

Exhibit 65: Defendants' Rule 12(b)(6) Motions to Dismiss, Vale v. City of Chi., et al.,

20 CV 5037, Dkt 38, 41

Exhibit 66 Peoples Gas Record.

Dated: March 3, 2022 Respectfully Submitted,

By: /s/ Raoul Vertick Mowatt
Assistant Corporation Counsel

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